

# EXHIBIT A

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

JENNIFER VAN VALLIS-BRIGHT,  
an individual,

Case No. 22-cv-10227

Plaintiff,

Honorable Paul D. Borman

v.

Magistrate Judge Curtis Ivy, Jr.

SCRIPPS MEDIA INC., a foreign company,

Defendant.

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**Declaration of Tony Lamerato**

1. I make this declaration based on personal knowledge of the facts stated herein, and am able to so testify under oath if called upon to do so.

2. I am currently the Senior Director of Revenue Strategy for the E.W. Scripps Company. From October 2016 through January 4, 2021, I was the Director of Sales for WXYZ-TV and WMYD-TV, which share a studio in Southfield, Michigan.

3. Plaintiff Jennifer Van Vallis-Bright is a former sales account executive for WMYD, who left the company in December 2021. While I was Director of Sales in 2020, she was a member of the sales team that I supervised.

4. In 2021, Ms. Vallis-Bright generated significant revenues and profits for Scripps. While the precise figures are confidential information, Ms. Vallis-Bright's 2021 sales resulted in net profits of several hundred thousand dollars.


5. I am intimately familiar with the local advertising market in the metropolitan Detroit area as a result of my job duties. Advertisers generally have a fixed budget per year that they spend on advertising, and both television and radio stations compete to obtain a share of advertiser dollars. Audacy is a direct competitor of Scripps in the Detroit advertising market, not only for broadcast advertisements, but also for digital advertising on websites and Over the Top (OTT)/Connected TV platforms.

6. I have reviewed the job description of the Audacy, Inc. General Sales Manager position that Ms. Vallis-Bright provided to Scripps through her attorney in December 2021, when asking for a release from her non-competition agreement. The job duties of the Audacy position are consistent with the job duties of Sales Managers at WXYZ/WMYD, and of Sales Manager positions for broadcast companies in the Detroit market area.

7. A General Sales Manager position in the Detroit market area, like the one identified in Audacy's job description, almost certainly would pay a base salary of between \$125,000 and \$160,000 per year. In addition to base salary, a General Sales Manager would receive commissions based on the activities of her sales team. Even if Ms. Vallis-Bright received the lowest base salary of \$125,000 (which is unlikely given her experience) the base salary plus commissions for the Audacy position would almost certainly result in a total annual compensation of \$150,000, and very likely more.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 10, 2022

  
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Tony Lamerato